

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
Hearing Date: December 12, 2024 at 1:00 p.m. (ET) Objection Deadline: December 6, 2024 at 4:00 p.m. (ET)	
Ref. Nos. 27182 & 27201	

**CERTIFICATION OF COUNSEL REGARDING DEBTORS'
ONE HUNDRED TWENTY-FIFTH (SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN OVERSTATED AND/OR UNLIQUIDATED
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On October 23, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ One Hundred Twenty-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 27182, redacted & 27201, sealed] (the “Objection”).
2. Pursuant to the Notice of Objection attached to the Objection [D.I. 27182-1 & 27201-1], any responses to the Objection were to be filed no later than December 6, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).
3. The FTX Recovery Trust received informal responses (the “Informal Responses”)

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

to the Objection from holders of claim numbers 65558 and 35907.

4. On November 21, 2024, Antoine Aymard (“Aymard”), holder of claim number 51976, filed a response to the Objection [D.I. 28121] (the “Aymard Response”).

5. On November 26, 2024, Liu Yi Lin (“Lin”), holder of claim number 18030, filed a response to the Objection [D.I. 28411] (the “Lin Response”).

6. On November 27, 2024, DCP Master Investments XIV LLC (“Diameter”) filed a response to the Objection [D.I. 28415] (the “Diameter Response”).

7. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the FTX Recovery Trust.

8. The FTX Recovery Trust is withdrawing the Objection solely with regard to claim number 73573 without prejudice and with all rights of the parties reserved with regard thereto.

9. The FTX Recovery Trust has revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as Exhibit A, to reflect the withdrawal and adjournments to the Objection solely with respect to the claims of Aymard, Lin, and Diameter and claim numbers 65558 and 35907. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as Exhibit B. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

10. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: February 4, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
jenc@sullcrom.com

Counsel to the FTX Recovery Trust